

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Jamie Davis,

Plaintiff

v.

Diversified Consultants, Inc., and  
DOES 1-10, inclusive,

Defendants

Civil Action No. 1:13-cv-10875-FDS

**MOTION OF DEFENDANT DIVERSIFIED CONSULTANTS, INC.  
FOR SUMMARY JUDGMENT**

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Pursuant to Fed. R. Civ. P. 56, the Defendant Diversified Consultants, Inc. (“DCI”) moves for summary judgment as to all claims made by the Plaintiff Jamie Davis (“Davis”). In support of this Motion, DCI states that there is no dispute as to any material fact and, on the undisputed facts, it is entitled to summary judgment dismissing all claims. In further support of this Motion, DCI submits the accompanying Memorandum of Defendant Diversified Consultants, Inc. in Support of its Motion for Summary Judgment; Local Rule 56.1 Statement of Undisputed Material Facts; Affidavit of Rafal Leszczynski; and the Affidavit of John J. O’Connor. For these reasons and the reasons provided in the accompanying materials, this Motion should be allowed and an Order should issue granting summary judgment dismissing all claims.

Request for Oral Argument

DCI requests a hearing on its Motion for Summary Judgment.

Local Rule 7.1 Certification

I, John J. O'Connor, certify that I have communicated with plaintiff's counsel in compliance with Local Rule 7.1.

/s/ John J. O'Connor  
John J. O'Connor

DIVERSIFIED CONSULTANTS, INC.,

By its attorneys,

/s/ John J. O'Connor  
John J. O'Connor  
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Dated: March 31, 2014

**CERTIFICATE OF SERVICE**

I do hereby certify, that on March 31, 2014, I served the within document, by causing a copy thereof, to be sent electronically to the registered participants in this case, if any, as identified on the Notice of Electronic Filing (NEF) and paper copies mailed, first class mail, postage prepaid to any non-registered participants in this case.

/s/ John J. O'Connor

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